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December 29, 2023

The request to seal is GRANTED.

VIA ECF

The Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street, Room 701
New York, New York 10007

DATE: January 2, 2024

SO ORDERED.

A handwritten signature of Lewis J. Liman in black ink, written over a horizontal line.

LEWIS J. LIMAN
United States District Judge

Re: United States v. Michael Shvartsman et al, 23 Cr. 307 (LJL)
Letter Motion to Seal Documents

Dear Judge Liman:

I represent Defendant Michael Shvartsman in connection with the above-referenced matter. Mr. Shvartsman submits this letter motion respectfully requesting that certain exhibits filed last Friday in connection with defendant's omnibus pretrial motion be ordered sealed and replaced in public filings with redacted versions of those exhibits.

Specifically, the motion included a Declaration of Tai H. Park (Dkt. 57), which appended certain exhibits, contained personal, identifying information such as dates of birth, telephone numbers, as well as passport numbers, and names of individuals in connection with the government investigation that had not been made public. Those details are contained in: Exhibit B; Exhibit C; Exhibit D; Exhibit E; Exhibit I; Exhibit O; and Exhibit P.

While those documents have been sealed on a temporary basis upon request of the Clerk, we request that: Exhibit B; Exhibit C; Exhibit D; Exhibit E; Exhibit I; Exhibit O; and Exhibit P be kept under seal by order of the Court. A redacted version of the above exhibits will be filed via ECF. We notified the government of this request late this afternoon and they have not raised any objections as of the writing of this letter.

If this request is acceptable to the Court, we respectfully request that Your Honor so order this request to seal.

Respectfully submitted,

A handwritten signature of Tai H. Park in black ink, written in a cursive style.

Tai H. Park

cc: All counsel of record via ECF